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**UNITED STATES DISTRICT COURT**

# DISTRICT OF NEVADA

EMILY ZERVAS.

Plaintiff,

vs.

USAA GENERAL INDEMNITY COMPANY,  
a foreign corporation doing business in  
Nevada, DOES I through X and ROE  
CORPORATIONS XI through XX,

## Defendants.

CASE NO. 2:18-cv-00051-JAD-GWF

**STIPULATION AND ORDER TO EXTEND  
DEADLINE FOR USAA'S REPLY IN  
SUPPORT OF MOTION TO STAY  
PROCEEDINGS**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Danielle C. Miller,  
20 Esq. of LEWIS BRISBOIS BISGAARD & SMITH LLP, counsel for Defendant USAA  
21 General Indemnity Company (“USAA”), and William W. McGaha, Esq. of SCHUETZE &  
22 McGAHA, P.C., counsel for Plaintiff Emily Zervas (“Plaintiff”), that:

23 The due date for USAA's Reply in Support of its Motion to Stay Proceedings, (ECF  
24 No. 16), be extended from May 7, 2018 to May 11, 2018.

25 This Request for an extension of time is not sought for any improper purpose or  
26 other purpose of delay. This request for extension is based upon the following:

27 Counsel for Defendants initiated this request because they have been hired by the  
28 Clark County School District to conduct an investigation into allegations made by a former

1 employee regarding accusations of rampant favoritism and discrimination. This  
2 investigation requires numerous interviews of prospective witnesses and the review of  
3 voluminous pertinent documents. Counsel for Defendants are also occupied with  
4 reviewing and disclosing extensive ESI discovery in a 600 Member Class Action Lawsuit,  
5 *Small et al v. University Medical Center of Southern Nevada*, U.S. District Court, 2:13-cv-  
6 00298-APG-PAL. This is USAA and Plaintiff's first request to extend this deadline, which  
7 is made in good faith and not for purposes of delay.

8 WHEREFORE, the parties respectfully request that this Court extend the time for  
9 USAA to file its Reply in Support of its Motion to Stay Proceedings from May 7, 2018 to  
10 May 11, 2018.

11 DATED this 3 day of May, 2018

12 SCHUETZE & McGAHA, P.C.

14 By:

15 WILLIAM W. McGAHA, ESQ.  
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*Attorneys for Plaintiff*

DATED this 3 day of May, 2018

LEWIS BRISBOIS BISGAARD & SMITH LLP

By:

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*USAA General Indemnity Company*

21 ORDER

22 IT IS SO ORDERED.

23 DATED this 4th day of May, 2018.

  
George Foley Jr.

24  
25 U.S. MAGISTRATE JUDGE  
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BRISBOI  
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